

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Advanced Methods to Target and)	CG Docket No. 17-59
Eliminate Unlawful Robocalls)	
)	
Call Authentication Trust Anchor)	WC Docket No. 17-97

COMMENTS OF THE NATIONAL OPINION RESEARCH CENTER

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EXECUTIVE SUMMARY

The December 20, 2019 Public Notice seeks comment on the implementation and effectiveness of call blocking measures, including experience since June 2019 with the default implementation of “reasonable analytics” to block calls that are labeled as suspicious or spam. The National Opinion Research Center (“NORC”) supports the Commission’s efforts to establish a reliable, transparent system to block illegal calls and to regain public trust in telephone communications. However, from its vantage point as the Center for Disease Control’s (“CDC”) contractor, performing the annual National Immunization Survey (“NIS”), NORC’s call completion rate has eroded, and the reasons for this appear to be the use of analytics engines that do not appropriately differentiate between spam and legitimate federal health policy calls placed by NORC. The annual NIS is the CDC’s primary means to gather critical public health information. The survey requires that millions of calls be placed for vaccination information to be collected. That calling pattern does not mean that these calls should be labeled as spam. This false positive result for at least some CDC NIS calls presents a serious public health problem that requires a prompt and comprehensive solution.

Despite the importance of the calls made for the CDC and the fact that the numbers used are few, public and with the caller ID of “CDC NATL IMMUN,” NORC has been unable to get this situation addressed. There is no consistency in information about who is blocking and why, so NORC lacks the ability to get these calls flowing. No party in the blocking ecosystem currently appears to be accountable to notify NORC that a call has been blocked or to provide prompt redress for mislabeling of calls. Each entity seems to hand off the issue to another, creating a cycle where issues spin around and around and are not resolved.

Transparency, accountability, and meaningful redress are three necessary conditions lacking in the current default call blocking system, at least as to false positive call labelling. The FCC must ensure that the protections it stated would be available to callers are in fact available. Without them, it would be arbitrary to grant any form of safe harbor protection to voice carriers and call-blocking service providers. NORC would welcome new solutions that can improve call completion outcomes for the federal government, including a national white list program that could include such critical calls.

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The National Opinion Research Center (“NORC”) submits these Comments to address three critical aspects within the Consumer and Governmental Affairs Bureau’s Public Notice seeking input for a report on the implementation and effectiveness of call blocking measures.¹ For better or worse, NORC is on the front lines of carrier implementation of default call blocking and it is apparent that some issues must be addressed before callers and consumers can be confident that “reasonable analytics” are not mislabeling and blocking calls without notice to callers.

First, the inconsistent and non-transparent analytics employed thus far by existing call-blocking tools have resulted in noticeable blocking without notice to NORC of legitimate calls that are critical to public health. Second, while the Federal Communications Commission (“FCC” or “Commission”) encouraged carriers to offer opt-in white-list programs to consumers, these programs are not well defined, their effectiveness is not subject to any oversight and in any case they would fail to address the federal government’s public health use case of most concern to NORC. Third, because many existing analytical tools continue to be inaccurate and in many cases overly inclusive in mislabeling calls in a manner that creates far too many false positive results,

¹ See Public Notice, *Consumer and Governmental Affairs Bureau Seeks Input for Report on Call Blocking*, FED. COMM’CN COMM’CN, DA-19-1312 (Dec. 20, 2019).

there is no reason for celebration or complacency. However well-intentioned the Commission's call blocking determinations in its 2019 Declaratory Ruling² may have been, its implementation within a complicated ecosystem of carriers and third-party blocking service providers requires continued agency vigilance and further action.

NORC fully supports the FCC's goal to combat illegal robocalls and spoofed calls. A reliable, transparent system for the successful blocking of spam, illegal and unwanted telemarketing calls should help to regain consumers' trust in the validity of incoming calls, which was the motivating reason for the Commission's encouragement for the deployment of call authentication frameworks. However, NORC cautions that the opaqueness in the use of today's call-blocking analytics tools is having a deleterious effect on call completion and adding costs onto legitimate business callers without obvious benefit. When a caller today suspects, based on an erosion of its call completion statistics, that an outbound call may have been blocked, it has no notice that the call was in fact blocked, no knowledge of who blocked it, or the root determination as to why it was blocked. This is despite the Commission's statement in its 2019 Declaratory Ruling that notice and prompt redress are critical pieces of the call blocking puzzle. A caller faces another nearly insurmountable set of challenges when the mechanism to remedy erroneous blocking is either not available or where each entity points to another as the probable cause of blocking. This effectively creates a system where the caller has no meaningful opportunity to discover or to challenge arbitrary or incorrect call classification determinations made without notice because the caller may not know what entity blocked a call or why it was blocked, resulting in no ability to get resolution of the matter.

² Advanced Methods to Target and Eliminate Unlawful Robocalls, *Declaratory Ruling and Third Further Notice of Proposed Rulemaking*, 34 FCC Rcd. 4876 (2019).

In this early stage environment, it is plain that there is more work to be done so that every player in the ecosystem shares responsibility for notification and prompt redress when calls are blocked using a false positive probability or assumption. The FCC cannot abandon the field to carriers and third-party providers to determine their own subjective criteria for what they deem to be “reasonable analytics,” particularly when the false positive mislabeling results are as poor as they currently are.

Moreover, in cases where the government needs to contact individuals by phone, government callers should be able to demonstrate their qualification for any national white-list program. Until all of these things occur, the FCC should postpone the adoption of any safe harbor provision as proposed in the Third Further Notice of Proposed Rulemaking adopted along with the 2019 Declaratory Ruling. It would be arbitrary and capricious to adopt safe harbors for call blocking based on flawed predictive analytics until a stable, predictable call authentication framework is in place on all networks that provides real notice and immediate redress for any call blocked based on a false positive premise due to mislabeling. Business callers and the federal government should have a reasonable and not overly burdensome shot at ensuring that important calls reach their intended audience.

I. INTRODUCTION

Founded in 1941, NORC at the University of Chicago helped establish and continues to strengthen the constantly evolving field of social science research.³ Numerous data collection and analytical tools that now set the industry standard were pioneered at NORC. Since its early years-

³ As one of the oldest not-for-profit, academic research organizations in the United States, and through its affiliation with the University of Chicago, NORC maintains the highest standards of professional excellence and scientific rigor, and is committed to broad dissemination of its findings.

when wartime public polling first brought the organization to prominence, NORC has enriched public policy research and fact based decision making by gathering and distilling critical information and contributing to the creation of new bodies of knowledge. As a non-profit organization committed to serving the public good, NORC's work continues to inform decision makers and provides the foundation for effective solutions. NORC's research expertise grows out of its long history of working with government agencies, academic institutions, foundations, and other organizations. Its staff includes rigorously trained and widely published leaders from a diverse array of fields such as health, education, economics, security, mental health, criminal justice, the environment, international development, and more.⁴ NORC's work is enhanced by its strong collaborative relationships with prominent experts, senior government officials, and leading scholars, among others. NORC maintains a large field staff and call centers to support a variety of long-term and quick-response national and international projects. NORC has direct and deep experience as a federal contractor for essential periodic federal government surveys.⁵

NORC previously engaged with the FCC to highlight the significant legal and practical implications on the compelling federal public health interest in placing necessary federal government calls and analyzing the information obtained from these calls if the FCC adopts broad interpretations of Telephone Consumer Protection Act (“TCPA”) prohibitions that would expose federal contractors like NORC to potentially crippling liability.⁶ NORC’s largest recurring survey

⁴ These experts are organized into substantive research departments and centers that collaborate with NORC's statistics, technology, and operations groups to deliver core capabilities to clients.

⁵ All surveys that NORC conducts for its federal clients that involve human subjects as respondents must be reviewed and approved by NORC’s or the federal client's Internal Review Board (“IRB”), a committee that reviews and approves research involving human subjects. The IRB’s purpose is to ensure that all human subject research be conducted in accordance with federal, institutional and ethical guidelines.

⁶ See Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Comments of the National Opinion Research Center*, CG Docket Nos. 18-152, 02-278 (June 13,

contract is with the Center for Disease Control's ("CDC") to conduct the National Immunization Survey ("NIS"). As described by the CDC on its website, the NIS is an annual survey of households and physicians that provides otherwise unavailable information that identifies trends in vaccinations nationwide, providing critical insights to the CDC that promote public health in communities everywhere.

By design and in order to collect the information needed, NORC must call millions of residential or wireless telephone numbers annually. The information gathered from these surveys allows the CDC to determine the need to provide for specific vaccines in specific communities nationwide. In order to get actionable vaccine information in particular communities, NORC may at times initiate a high number of calls. This calling pattern is necessary for NIS effectiveness, but it was one of a number of factors that the FCC identified in its 2019 Declaratory Ruling as possibly being an indicia of potentially problematic calling. This may be triggering a "spam" label on some NIS calls by some analytics providers, as NORC is experiencing a notable number of calls being blocked without notice. However, the very limited pool of phone numbers used for the NIS are open and notorious. The CDC actually lists the three numbers NORC uses for the NIS survey on its website,⁷ which are labelled for Caller ID purposes as "CDC NATL IMMUN." These calls

2018); Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Notice of June 5, 2017 Ex Parte Meeting*, CG Docket No. 02-278 (June 7, 2017); Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Notice of November 15, 2016 Ex Parte Meeting*, CG Docket 02-278 (Nov. 18, 2016); Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Opposition to Petition for Reconsideration by the National Opinion Research Center*, CG Docket No. 02-278 (Aug. 31, 2016); Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Notice of Oct. 15, 2015 Ex Parte Meeting*, CG Docket No. 02-278 (Oct. 19, 2015); Rules and Regulations Implementing the Telephone Consumer Protection Act of 1991, *Notice of September, 30, 2015 Ex Parte Meeting*, CG Docket No. 02-278 (Oct. 05, 2015).

⁷ See Attachment A, Centers for Disease Control & Prevention, *National Immunization Surveys*, <https://www.cdc.gov/vaccines/imz-managers/nis/index.html> (last visited Jan. 24, 2020).

should not be blocked or mislabeled as spam or as otherwise problematic. NORC was assigned these numbers from a national carrier and NORC has a known identity and known use for these numbers. Nevertheless, NORC's calls have been repeatedly, and increasingly, blocked by the deployment of various analytics engines, including it appears, from the very carrier from whom NORC subscribes those numbers. This false positive blocking is a very serious unresolved issue for NORC and for the federal government in its efforts to improve public health.

Effective call-blocking is important, but it also has to be reasonable, transparent and fair for legitimate callers. Carriers, mobile application providers and third-party analytics or reputation companies all have a financial stake in these issues but no direct responsibility to be attentive to issues as they emerge, and the results speak for themselves. The recent implementations of call blocking analytics have disrupted NORC's NIS call completion without any opportunity for NORC to discover specific instances of blocking. Moreover, the ability to get redress within the increasingly complex ecosystem is either elusive or illusory. Since the FCC has taken a significant step to direct the default blocking of calls by the use of "reasonable analytics" in mid-2019, NORC has seen a drop off in its overall call completion statistics as compared to its last periodic survey. While the reason may be multi-faceted, it is reasonable to believe that many of NORC's NIS calls have been mislabeled and thus blocked by some predicative analytics engines. Even taking expensive steps such as paying a third party to "treat" the NIS numbers for "reputation management" has not restored call completion rates to those experienced prior to the deployment of call blocking analytics. Thus, the issue of discovering and fixing the false positive problem is real, immediate, and requires effective action by the FCC.

II. “REASONABLE ANALYTICS” MUST BE SUBJECT TO OBJECTIVE CRITERIA TO MINIMIZE FALSE POSITIVE CALL-BLOCKING.

The CDC maintains information on its website about the critical nature of its survey, and a general information letter that explains why public participation in the survey is important.⁸ While individuals certainly are free to decline to cooperate with the CDC in its attempt to gather the critical public health information in the annual NIS, as a matter of public policy, unregulated analytics engines employing unknown criteria or metrics should not be determining the desirability of completing these federal government calls. Fundamentally, to ensure there is some objective judgement and transparency within the ecosystem, the FCC must address with more specificity how such federal government calls are to be treated. “Unwanted” is not an objective criterion that carriers or analytics engines are well-equipped to identify for individuals, the majority of whom welcome the opportunity to improve public health data and outcomes. As the FCC recognizes, what might be a welcome call to one person could be annoying to another. However, the FCC’s way of dealing with this issue, which is to assume individuals will add “wanted” calls to their contact lists, is not a reasonable assumption or appropriate treatment for these particular types of federal government survey calls that are by their nature random and not expected.

The FCC in its 2019 Declaratory Ruling noted that one other possible indicia of calls being “unwanted” and therefore potentially eligible for blocking could be consumer self-reporting of calls the individual considers annoying. There is no discussion about how material the level or frequency of individual complaints may be before an analytics engine screens for this criteria, nor

⁸ Attachment B, Nancy Messonnier, *Letter from the Director, National Center for Immunization and Respiratory Diseases*, Centers for Disease Control and Prevention, <https://www.cdc.gov/vaccines/imz-managers/nis/downloads/advance-letter-508.pdf> (last visited Jan. 24, 2020).

any filter to distinguish calls made to individuals to advance federal government administration of public health.

NORC submits that self-reporting by individual consumers or the volume of calls made over time are not reliable indicators of probable spam or potential fraud from federal government survey calls. While NORC recognizes that public disclosure of precisely how analytics engines are designed, updated or modified could provide spammers and fraudsters with new tools, the Commission cannot discard or ignore the importance of having defined safeguards to allow legitimate callers to discover and to challenge incorrect determinations immediately as they arise so they can be resolved without delay. While the FCC stated that that was its expectation, NORC's experience demonstrates that whatever analytics programs are in place with carriers and third parties fail thus far to provide NORC with any actionable information as to whether some call was blocked, or by whom, or why. Any fair or acceptable system must provide this information to the caller right away so it can be addressed.

In NORC's experience, when queried, carriers simply point to the analytics engine providers who they use in their networks, who then point back to the carrier to explain criteria for blocking, and thus no entity claims responsibility to be in control of a result that mistakenly blocks important federal government calls. This stymies the ability of NORC to get a blocking situation addressed and resolved. This is the essence of arbitrary treatment. More is required from the system when lawful calls are blocked and it is the FCC's role to provide guidance and oversight to this process.

As it reviews information on the effectiveness of call blocking for its report, the Commission should prioritize putting meaningful safeguards in place so that there is effective oversight and so that the agency can better ensure that callers are not boxed into a corner where

they are unable to get redress. The current situation fails miserably to provide callers with a fighting chance to prevent potentially abusive call blocking by carriers, reputation managers and analytics companies. Transparency should mean that callers have actionable information and a meaningful opportunity to demonstrate their calls should not be blocked by default using predictive analytics.

In its pending Notice of Proposed Rulemaking, the Commission is, among other things, seeking to frame requirements on carriers and VoIP providers that assign telephone numbers to “know their customer” to better ensure that numbering resources are not misused by pernicious actors. This makes sense and could be part of the solution for all service providers that assign numbering resources. NORC’s carrier for example, as the originating carrier for the NIS telephone numbers, should be required to know its customer NORC and the general use of these numbers, so that it has appropriate incentives to and can apply this information to inform whatever analytics it chooses to employ for call blocking by default. As things stand now, the fact that NORC is a known customer with known use of numbering resources seems to be isolated from the carrier’s use of analytics to block some number of NORC’s NIS calls.

The false positive call blocking problem is serious, and the minimal standards the FCC articulated in a general manner in its 2019 Declaratory Ruling have not yet been fleshed out in the sense that each carrier or analytics engine provider does not view as its responsibility providing actual notice or redress to callers for blocked calls. The FCC needs to take this lack of accountability problem as seriously as it takes any other public safety or federal public health challenge when it comes to CDC calls. Without a satisfactory solution, any movement by the FCC to endorse a safe harbor for carriers for what seems currently to be an arbitrary and unreasonable set of results in call blocking by default would be subject to litigation. Adequate vetting processes

can demonstrate the legitimacy of certain calls such as the CDC NIS calls. These should be required so that additional costs and processes that should not be necessary for these calls do not burden the callers.

III. FEDERAL GOVERNMENT CALLERS SHOULD BE ABLE TO DEMONSTRATE QUALIFICATION FOR ANY WHITE-LIST PROGRAM.

The Commission has raised the possibility of national white listing of certain important calls, observing that first responder and emergency calls should never be blocked. NORC agrees that a national white list approach has merit as one way to address the false positive blocking issue currently faced by federal government callers.⁹

If the FCC pursues establishment of a national white list, it should recognize that the federal government has important matters that require contact with members of the public by phone, and that there should be a mechanism available for the FCC to vet and include numbers for such a white list. While perhaps not every call for every purpose should be accorded white list treatment, there should be an opportunity provided to federal government caller numbers to be included in any registry or list. The CDC's need for on the ground, local information about vaccine use is a crucial public health matter. This circumstance should be accorded some weight by the FCC, and CDC calls should not assigned a probability of spam score by an unaccountable analytics engine. One potentially effective way of addressing this issue would be to allow federal government callers to apply to have their numbers included on a white list.

⁹ Calling by phone remains the CDC's preferred method of conducting statistically valid vaccination surveys, as in-person interviewing is cost prohibitive and other methods, such as mailing a letter or directing a person to fill out an on-line survey, would fail to meet the survey quality standards set by the CDC.

IV. THE FCC CANNOT ADOPT ANY SAFE HARBOR PROVISION FOR CALL BLOCKING UNTIL CALL AUTHENTICATION AND ANALYTICS FRAMEWORKS DEMONSTRATE TRANSPARENCY AND HAVE ADEQUATE, IMMEDIATE REDRESS FOR FALSE POSITIVES.

NORC recognizes the serious nature of illegal and spam calls and texts and recognizes that the Commission took the steps it did in its 2019 Declaratory Ruling to ensure that “bad” calls never reach individuals because they would be identified and blocked by reasonable predictive analytics. However, in practice thus far, the FCC cannot declare victory or be lulled into a false complacency that “reasonable analytics” that is self-determined by carriers and blocking service providers is leading to fair and transparent call blocking results. This is because call blocking is being done in a standardless manner with no direct FCC oversight, leading to many calls being blocked without notice and without effective redress. It would be an appropriate pre-condition to the grant of any safe harbor for voice service providers and other third parties that use analytics to block calls to maintain public points of contact available at all times. Whomever is designated by each entity should have sufficient authority to address and remedy erroneously blocked calls. Situations that involve more than one entity should involve some type of cooperative escalation process so that disputes as to accountability cease. These steps should not be controversial, as the Commission assumed that that would be the case in its 2019 Declaratory Ruling.¹⁰ Without this and other safeguards consistent with the parameters the FCC already set forth in the Declaratory Ruling, any safe harbor would be premature and would fail to balance the needs of legitimate callers for prompt notice and redress with the strong public interest in minimizing the completion of illegal or true spam calls.

¹⁰ 34 FCC Rcd. 4876, para. 58.

The FCC’s general proposal in the Third Further Notice of Proposed Rulemaking portion of the 2019 Declaratory Ruling was that any safe harbor for voice service providers that offer call-blocking programs should take into account whether a call has been properly authenticated under the SHAKEN/STIR framework.¹¹ As the Commission is aware, implementation of SHAKEN/STIR is not complete, as evidenced by the recent legislative TCPA amendment recognizing the need to provide for exemptions where voice service providers may be granted a “delay of compliance” with the required authentication framework.¹² Without the deployment of a uniform authentication framework from the originator to the receiver, a call can fail authentication at any point of the transmission. Any immunity for “choos[ing] to block calls . . . that fail Caller ID authentication under the SHAKEN/STIR framework” without ensuring that SHAKEN/STIR or equivalent call authentication framework have been widely adopted by voice service providers in both IP and non-IP networks will likely aggravate the false positive problem discussed above. Thus, moving forward with any safe harbor now would be premature and run counter to the FCC’s previous call completion policy where the FCC observed that call blocking should only be authorized in “rare and limited circumstances.”¹³

Moreover, existing practice of call-blocking services largely contradicts the FCC’s stated goal that the “[t]o be reasonable, . . . [call-blocking] analytics must be applied in a non-discriminatory, competitively neutral manner.”¹⁴ In the seven months since the adoption of the 2019 Declaratory Ruling, NORC has observed that the call-blocking industry functions as a

¹¹ *Id.* at para. 49.

¹² Pallone-Thune Telephone Robocall Abuse Criminal Enforcement and Deterrence Act, Pub. L. No. 116-105 (2019) (amending 47 U.S.C. § 227).

¹³ Advanced Methods to Target and Eliminate Unlawful Robocalls, *Report and Order and Further Notice of Proposed Rulemaking*, 32 FCC Rcd. 9706, para. 8 (2017).

¹⁴ *Id.* at para. 35.

collection of self-interested commercial entities, realizing new profit opportunities where the call completion rate at times appears to correlate to the amount of money callers are willing to spend monthly on “treating” or “optimizing” their numbers. As there is no transparency as to how numbers are optimized so they are subject to less blocking, there is no accountability either. As a result, there should be no safe harbor until there is transparency and effective redress for false positive call-blocking.

As Commissioner Michael O’Rielly stated in his partial dissent to the 2019 Declaratory Ruling, “formalizing [a] redress mechanism is a necessary corollary, especially for blocking performed at the network level and not subject to customer consent.”¹⁵ The experience of the past seven months demonstrates that a transparent system with accountability and meaningful redress mechanism is a necessary pre-condition to qualify any service providers for safe harbor. The prevalence of erroneous blocking and a complete lack of practical, efficient solutions to mitigate its harm call for the FCC to encourage transparency in call blocking results and to focus on incentivizing solutions that can demonstrate measurable results and effective solutions when issues arise.

NORC supports the Commission’s efforts to weed out illegal and abusive calling. But it is apparent that unregulated, overzealous blocking of legitimate calls without accountability has created a situation where commercial entities are profiting by assessing charges on federal government and other calls to optimize numbers, even while delivering uneven results. The FCC must address the serious false positive issue with CDC NIS calls immediately. In any case, a set of well-defined, consistently applied safeguards against false positive blocking must be put in place prior to any adoption of safe harbors for call blocking.

¹⁵ *Id.* at 9759 (statement of Commissioner Michael O’Rielly).

V. CONCLUSION

NORC appreciates the opportunity to comment on its experience of declining call completion for the CDC's annual National Immunization Survey. However well-intentioned the FCC's exercise in endorsing default blocking by use of "reasonable analytics," it is plain that the implementation of this program has not been reasonable in terms of its results as to NORC's calling for the CDC. NORC submits that the Bureau's report should highlight the serious issues presented by false positive call blocking, and the current lack of any consistent way to discover who is blocking calls and why. This transparency and availability of immediate redress must be resolved prior to the grant of any safe harbor relief for use of what thus far seem to be unreasonable analytics.

Respectfully submitted,



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January 29, 2020

Attachment A



Centers for Disease Control and Prevention
CDC 24/7: Saving Lives, Protecting People™

National Immunization Surveys (NIS)

[<< Back to Vaccines Home](#)



The National Immunization Surveys (NIS) are a group of telephone surveys sponsored and conducted by CDC's National Center for Immunization and Respiratory Diseases (NCIRD). Since 2018 the National Immunization Surveys have used a single frame survey design, that includes calling cell phone numbers for household interviews with parents or guardians. If the parent or guardian provides consent and contact information, a questionnaire is mailed to children's vaccination providers. [Learn more...](#)

Have You Gotten a Call about a Survey?

Have you or someone in your household received a phone call from **312-871-4241**, **312-871-4242**, or **312-871-4243** (Caller ID CDC NATL IMMUN), to take part in the National Immunization Surveys?

Your Information Is Confidential

Information collected in the National Immunization Surveys is used **only** for reporting important statistical information about health issues. It is against federal law for us to give your name or any other information that could identify you to anyone, including the President, Congress, NSA, Department of Homeland Security, IRS, INS, etc.



About the National Immunization Surveys (NIS)

Overview of the three surveys and background on the first survey, which began in 1994 to check vaccination coverage after measles outbreaks in the early 1990s...



For Participants

Have you received a call from 312-871-4241, 312-871-4242, or 312-871-4243 (Caller ID CDC NATL IMMUN)? Find information about the surveys...



For Health Care Professionals

Information for vaccination providers who are asked to complete an immunization history questionnaire...



Data, Tables, and Documentation

Links to all NIS data, including tables, data files, participant and provider questionnaires, related documentation...



Publications and Resources

Scientific articles on the surveys and immunization coverage in the U.S.



Confidentiality 2015 to Present

Learn how the National Immunization Surveys keep your information private...

Page last reviewed: January 23, 2018

Content source: [National Center for Immunization and Respiratory Diseases, Immunization Services Division](#)

Attachment B



National Center for Immunization
and Respiratory Diseases
1600 Clifton Road, NE
Mail Stop E-05
Atlanta, Georgia 30333

From the Director, National Center for Immunization and Respiratory Diseases:

I am asking for your help with an important study conducted by the Centers for Disease Control and Prevention (CDC) called the National Immunization Survey (NIS). This survey tells us which immunizations children in the U.S. have received and about other important health topics. Results from the NIS are used to help health officials in their efforts to protect the health of children. Since the NIS began in 1994, over 500,000 parents and over 300,000 healthcare providers have participated. In the next few weeks, NORC at the University of Chicago will call your household to ask you to take part in this study for CDC. Your personal information will be kept confidential and is protected by federal law.

In the first part of this study, we will ask you about your child's immunizations and health. Some households may also be asked questions about the health services their children need or use. In the second part, we will ask for your permission to contact your child's healthcare providers to ask about immunizations each provider has given to them. If you have a child between 17 and 37 months of age or a teen aged 13-17 years, it will be helpful to have the names and addresses of their healthcare providers handy.

Your phone number was chosen randomly by computer. It is important for us to interview every household we call to get a complete picture of your area's immunization rates and key factors that might affect them. The study is important, but you do not have to take part, or you can decide not to answer one or more questions.

You may call us toll free at **1-877-220-4805** if you would like to take part in the study or to learn more about the study and what you will be asked. For more information, turn this letter over or go to the study web site: www.cdc.gov/vaccines/nis.

Your answers to the NIS will provide information to help improve the nation's health now and in the years ahead. We need your help and hope you will decide to take part when we call.

Thank you for your cooperation. I am grateful for your help.

Sincerely,

Nancy Messonnier, M.D.
Director, National Center for Immunization and Respiratory Diseases
Centers for Disease Control and Prevention
Captain, United States Public Health Service

OVER

What is NORC at the University of Chicago?

NORC at the University of Chicago (NORC) is an independent research organization that conducts interviews on immunizations and children's health for the CDC. Additional information on NORC can be found on its website at www.norc.org.

NORC Toll Free Number: 1-877-220-4805

You can call the NORC toll free number to take part in the study, learn more about the study, and hear what you will be asked.

Who sees my answers?

You will be called by a trained interviewer who enters your answers into a computer. Everyone who works on the survey must sign an oath that promises they will never give out anyone's personal information. Only a few people who work on this survey ever see any personal information. Answers that could identify you or your family in any way are separated from your other answers. Survey findings are put into summary reports that contain no names or other information that identifies you.

How do you protect my information?

Your answers are used for health research purposes only. We conduct this survey under the Public Health Service Act and the Privacy Act. These laws require that we protect your family's information and keep it confidential. If you would like to know more about how we protect your answers, these laws are described in detail at www.cdc.gov/vaccines/imz-managers/nis/confidentiality.html.

If you want to know more about your rights as a study participant you may call the NORC Institutional Review Board at 1-866-309-0542.

How do I find more about immunizations and places to get them?

You may call toll free 1-800-CDC-INFO (1-800-232-4636) for more information about vaccinations or to get the phone number of a doctor or clinic near you.

If you prefer to use a TTY



Please call the AT&T Relay Service at 711 and request that NORC be called at 1-877-220-4805.